Message

From: Gavin, Quinn [Gavin.Quinn@epa.gov]

Sent: 9/1/2022 1:46:31 PM

To: Reaves, Elissa [Reaves.Elissa@epa.gov]; Kiely, Timothy [Kiely.Timothy@epa.gov]

CC: Aranda, Amber [aranda.amber@epa.gov]; Javier, Julie [Javier.Julie@epa.gov]; Muhammad, Maryam K.

[Muhammad.Maryam@epa.gov]; Bartow, Susan [Bartow.Susan@epa.gov]; Arrington, Linda

[Arrington.Linda@epa.gov]

Subject: FW: SFIREG Issue Paper for Treated Seed Regulation August 2022

Attachments: SFIREG Treated Seed Issue Paper August 2022 Final.pdf; SFIREG Cover Letter to EPA Treated Seeds Issue Paper

August 2022.pdf

Confidential-Internal-Deliberative

Good Morning All,

I wanted to pass along this new potential footnote that Amber put together to address the recently issued white paper (attached above). This may be something that needs to be passed to Ed or even Michal but I wanted to run it by you first to get your thoughts. The issue paper leaves a good deal of ambiguity in how it is worded but we address the issues they raised in the response and will be looking for further information on the other topics in the ANPRM. Please let me know if you have any questions or if you want to pass this further up the chain before adding it into the document.

Thank you, Quinn

From: Aranda, Amber <aranda.amber@epa.gov> Sent: Thursday, September 1, 2022 8:30 AM

To: Gavin, Quinn <Gavin.Quinn@epa.gov>; Arrington, Linda <Arrington.Linda@epa.gov>; Bartow, Susan

<Bartow.Susan@epa.gov>; Javier, Julie <Javier.Julie@epa.gov>

Subject: RE: SFIREG Issue Paper for Treated Seed Regulation August 2022

For your consideration — Consider adding a footnote, perhaps in the conclusion, with something of this kind - "On August 31, 2022, EPA received a letter from the State FIFRA Issues Research and Evaluation Group (SFIREG) identifying a number of issues and questions relating to assessment of pesticides used to treat seed and use of treated seed. These issues or questions are addressed in this response and/or may be further addressed in the anticipated ANPRM."

Amber L. Aranda Environmental Protection Agency Office of General Counsel 202) 564-1737

From: Gavin, Quinn < Gavin.Quinn@epa.gov> Sent: Thursday, September 1, 2022 7:52 AM

To: Aranda, Amber <aranda.amber@epa.gov>; Arrington, Linda <Arrington.Linda@epa.gov>; Bartow, Susan

<Bartow.Susan@epa.gov>; Javier, Julie < Javier.Julie@epa.gov>

Subject: RE: SFIREG Issue Paper for Treated Seed Regulation August 2022

We have not received this separately so thank you for sending our way.

From: Aranda, Amber <a randa.amber@epa.gov>
Sent: Thursday, September 1, 2022 7:23 AM

To: Gavin, Quinn < Gavin.Quinn@epa.gov >; Arrington, Linda < Arrington.Linda@epa.gov >; Bartow, Susan

<Bartow.Susan@epa.gov>; Javier, Julie <Javier.Julie@epa.gov>

Subject: FW: SFIREG Issue Paper for Treated Seed Regulation August 2022

Importance: High

Quinn - Did you all receive this separately? Not sure why this was not sent directly to you all.

Amber L. Aranda Environmental Protection Agency Office of General Counsel 202) 564-1737

From: Huskey, Angela < <u>Huskey.Angela@epa.gov</u>>
Sent: Wednesday, August 31, 2022 6:46 PM
To: Aranda, Amber < aranda.amber@epa.gov>

Subject: FW: SFIREG Issue Paper for Treated Seed Regulation August 2022

I'm having trouble with adobe so I haven't read through these yet, but it seems like something we need to consider and figure out how it impacts (or will be impacted by) the draft petition response.

From: Hopkins, Yvette < Hopkins. Yvette@epa.gov > Sent: Wednesday, August 31, 2022 6:12 PM

To: Huskey, Angela < Huskey. Angela@epa.gov>; Teter, Royan < Teter. Royan@epa.gov>; Todd, Haley

<Todd.Haley@epa.gov>; McDonald, Erika <mcdonald.erika@epa.gov>; Isbell, Diane <lsbell.Diane@epa.gov>

Subject: FW: SFIREG Issue Paper for Treated Seed Regulation August 2022

Hot off the presses, the states weigh in. I have not read either doc yet.

From: Bahr, Gary (AGR) < GBahr@agr.wa.gov > Sent: Wednesday, August 31, 2022 4:59 PM
To: Ryan, Emily < ryan.emily@epa.gov >

Cc: Wijnja, Hotze (AGR) <hotze.wijnja@state.ma.us>; Brown, Amy Amy.Brown@fdacs.gov; aapco.sfireg Amy.Brown@fdacs.gov; aapco.sfireg Amy.Brown@fdacs.gov; Jones, Patrick <patrick.jones@ncagr.gov; Gretchen Paluch <greetchen.paluch@iowaagriculture.gov; Kelly Friend Keily.Friend@freshfromflorida.com; Patterson, Megan L Megan.L.Patterson@maine.gov; Bret W. Allen bret.allen@agri.nv.gov; Rousseau, David David.J.Rousseau@agr.nh.gov; anthony.lamanno@dec.ny.gov; tdrake@clemson.edu; Mackedanz, Roger (MDA) roger.mackedanz@state.mn.us; Dawn.Wall Dawn.Wall@mda.mo.gov; ryan.williams@ag.ok.gov; Traynham, Kima ktraynham@mt.gov; bob.blankenburg@alaska.gov; Picone, Kaitlin Picone, Kaitlin@epa.gov; Hopkins, Yvette Hopkins.Yvette@epa.gov; Wire, Cindy Wire.Cindy@epa.gov> Subject: SFIREG Issue Paper for Treated Seed Regulation August 2022">Naugust 2022

Emily,

As a follow-up to our June 2022 SFIREG meeting, I am pleased to submit the attached letter and issue paper to EPA for official review and response.

The State FIFRA Issues Research and Evaluation Group (SFIREG) and the Joint Working Committee (JWC) of SFIREG wish to express concerns regarding treated seed regulation and request that EPA take action to assess and respond to the findings of this SFIREG attached Issue Paper.

We look forward to working with EPA on this topic.

Sincerely,

Gary

Gary Bahr SFIREG Chair

Science Liaison
Washington State Department of Agriculture
Olympia, Washington
c-360-349-0522
gbahr@agr.wa.gov
https://aapco.org/2015/07/30/sfireg-3/